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18	UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC	
19		
20	UNITED STATES DIS	
21	NORTHERN DISTRICT	
22	SAN FRANCISCO	O DIVISION
23	WAYMO LLC,	Case No. 3:17-cv-00939-WHA
	Plaintiff,	DECLARATION OF MICHELLE YANG IN SUPPORT OF
24	v.	<b>DEFENDANTS' ADMINISTRATIVE</b>
25	UBER TECHNOLOGIES, INC.,	MOTION TO FILE UNDER SEAL THEIR RESPONSES TO COURT'S
26	OTTOMOTTO LLC; OTTO TRUCKING LLC,	QUESTIONS 1-2 AND 5-8 FOR FURTHER HEARING ON MOTION
27	Defendants.	TO STRIKE ASSERTED TRADE SECRET NUMBER 96
28		

I, Michelle Yang, declare as follows:

- 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Responses to Court's Questions 1-2 and 5-8 for Further Hearing on Motion to Strike Asserted Trade Secret Number 96.
- 2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Responses to Court's Questions 1-2 and 5-8 for Further Hearing on Motion to Strike ("Responses")	Highlighted Portions	Plaintiff (green) Defendants (blue)
Exhibit A	Entirety	Plaintiff Defendants
Exhibit B	Entirety	Plaintiff Defendants Third-party Velodyne

- 3. The blue-highlighted portions of the Responses and the entireties of Exhibits A and B contain highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical features of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.
- 4. The entirety of Exhibit B contains highly confidential technical information of third-party Velodyne. Defendants request the Court keep this third-party's technical information sealed in order to protect its competitive standing.

1	5. The green-highlighted portions of the Responses and the entireties of Exhibits A
2	and B contain information that has been designated "Highly Confidential - Attorneys' Eyes
3	Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order
4	("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017
5	Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of
6	the Protective Order.
7	6. Defendants' request to seal is narrowly tailored to the portions of the Responses
8	and its supporting papers that merit sealing.
9	I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th
10	day of September, 2017 in Washington, D.C.
11	
12	
13	
14	
15	ATTESTATION OF E-FILED SIGNATURE
15 16	ATTESTATION OF E-FILED SIGNATURE  I, Arturo J. González, am the ECF User whose ID and password are being used to file this
16	I, Arturo J. González, am the ECF User whose ID and password are being used to file this
16 17	I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.
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